

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PITTSFIELD GENERATING COMPANY, L.P.,

Plaintiff,

v.

DEVON CANADA CORPORATION,

Defendant.

Civil Action No:
04-30128-MAP

FILED
IN CLERK'S OFFICE
2004 DEC -9 A 10:22
U.S. DISTRICT COURT
DISTRICT OF MASS.

**MOTION FOR ADMISSION *PRO HAC VICE* OF
JOHN M. SIMPSON, ESQ. AND MICHELLE C. PARDO, ESQ.**

Anita B. Bapooji, an associate with the law firm of Testa, Hurwitz & Thibault, LLP, and a member in good standing of the bar of this Court, respectfully requests that this Court, pursuant to Local Rule 83.5.3, enter an Order authorizing John M. Simpson and Michelle C. Pardo of Fulbright & Jaworski, LLP to appear pro hac vice in the above-captioned case on behalf of Defendant Devon Canada Corporation for the following reasons:

- (1) Devon Canada Corporation is a defendant in the above-captioned matter;
- (2) Devon Canada Corporation has retained Fulbright & Jaworski, LLP to represent its interests in this proceeding and John M. Simpson and Michelle C. Pardo are its attorneys;
- (3) Mr. Simpson and Ms. Pardo have prepared certificates in accordance with Local Rule 83.5.3, attached hereto, certifying that:

(a) John M. Simpson is a member in good standing of the bars of the District of Columbia and North Carolina; the United States District Courts for the District of Columbia, Middle and Eastern Districts of North Carolina and Southern District of Texas; the Supreme

Court of the United States; the United States Courts of Appeals for the Fourth, Fifth, Tenth, Eleventh, Federal and District of Columbia Circuits; the U.S. Court of Federal Claims; and the U.S. Court of Appeals for Veterans Claims;

(b) Michelle C. Pardo is a member in good standing of the bars of the District of Columbia and Maryland; the United States District Courts for the District of Maryland and the District of Columbia; and the United States Court of Appeals for the Fourth Circuit;

(c) They are familiar with the facts surrounding this dispute and the Local Rules of the United States District Court for the District of Massachusetts; and

(d) There are no disciplinary proceedings pending against them as members of the bar in any jurisdiction.

WHEREFORE, I respectfully request that this Court enter an Order authorizing the admission pro hac vice of John M. Simpson and Michelle C. Pardo.

Dated: December 8, 2004

Respectfully submitted,

DEVON CANADA CORPORATION

By Its Attorneys



William L. Prickett (BBO #555341)

Anita B. Bapooji (BBO #644657)

Testa, Hurwitz & Thibault, LLP

125 High Street

Boston, MA 02110

Telephone: 617-248-7000

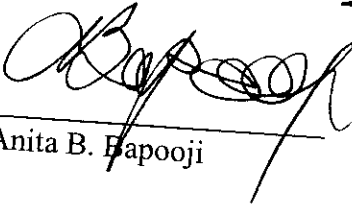
Facsimile: 617-248-7100

Counsel for Defendant

Devon Canada Corporation

CERTIFICATION UNDER LOCAL RULE 7.1(A)(2)

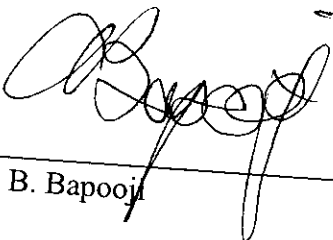
On December 8, 2004, I, Anita B. Bapooji, Esq. have spoken with counsel for Pittsfield Generating Company, L.P., David A. Brown, of the law firm Sherin and Lodgen LLP, who has assented to this motion.


Anita B. Bapooji

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* of John M. Simpson, Esq. and Michelle C. Pardo, Esq. was served, via first class mail, postage pre-paid on the 8th day of December, 2004 on the following:

Robert J. Muldoon
David A. Brown
Sherin and Lodgen LLP
101 Federal Street
Boston, MA 021100


Anita B. Bapooji

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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CERTIFICATE OF JOHN M. SIMPSON, ESQ.

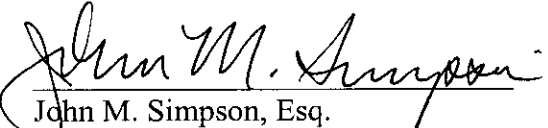
I, John M. Simpson, in accordance with Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, represent and certify as follows:

1. I am a member in good standing of the bars of the District of Columbia and North Carolina; the United States District Courts for the District of Columbia, Middle and Eastern Districts of North Carolina and Southern District of Texas; the Supreme Court of the United States; the United States Courts of Appeals for the Fourth, Fifth, Tenth, Eleventh, Federal and District of Columbia Circuits; the U.S. Court of Federal Claims; and the U.S. Court of Appeals for Veterans Claims;

2. I am familiar with the facts surrounding this dispute and the Local Rules of the United States District Court for the District of Massachusetts; and

3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

Dated: December 7, 2004


John M. Simpson, Esq.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PITTSFIELD GENERATING COMPANY, L.P.,

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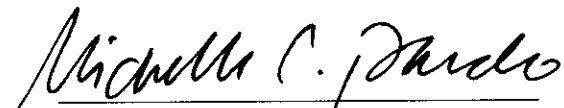
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CERTIFICATE OF MICHELLE C. PARDO, ESQ.

I, Michelle C. Pardo, in accordance with Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, represent and certify as follows:

1. I am a member in good standing of the bars of the District of Columbia and Maryland; the United States District Courts for the District of Maryland and the District of Columbia; and the United States Court of Appeals for the Fourth Circuit;
2. I am familiar with the facts surrounding this dispute and the Local Rules of the United States District Court for the District of Massachusetts; and
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

Dated: December 1st, 2004


Michelle C. Pardo, Esq.